

TABLE C
Schedule for CCP Environmental Cooperative Agreement Implementation

Project Activity	Start Date YR/MO/D	End Date YR/MO/D	Status or duration	Task
Air Const. Permit	---	2000/07/24 submitted	<i>Done</i>	CCP submits Conceptual Design to DNR (reference commitment IX.A.4)
Air Const. Permit	2000/07/24	2000/10/10	<i>Done</i>	DNR reviews Conceptual Design and notifies CCP what steps it should take to determine whether the project requires an Air Construction Permit or not.
Air Const. Permit	---	2001/02/15	2001/02/15 <i>Done</i>	CCP shall submit a letter to the Department requesting following the standard pocedures for requesting an exemption from an Air Construction Permit based on the criteria for minor modifications contained in NR 406 and NR 408 Wisconsin Administrative Code. In the letter CCP will define the option that it will follow a brief description of the project and state the reasons why CCP believes the project is exempt from an air construction permit. Under NR 408, if the sum of the increases and decreases in VOCs over the last 5 years (including the current project) is less than 25 tons, then the project is a minor modification. CCP should also document that the emissions from the project will not trip any of the exemption levels (VOCs, CO, NOx, PM, etc.) in NR 406. If none of the levels are tripped, then the project is an exempt modification and no construction permit is required. The letter should contain an analysis showing the emission rates of various pollutants before and after the project is completed, including the emissions from the increased use of natural gas resulting from the elimination of waste solvent combustion and any changes in emissions associated with the recovery and reuse of solvents.

Air Const. Permit	2001/02/15	2001/03/15 (target)	2001/05/22 DNR requested addition information.	DNR will review the letter and formally inform CCP whether DNR agrees with the exemption request, or if an air construction permit application is required.
Air Const. Permit	---	2001/04/15(or before)	Not required based on initial submittal	If required, CCP submits application for an air construction permit and initial permit review and expedited permit fees with the submittal (NR 410.03(1)(d), Wisc. Adm. Code) to expedite the review process. (reference CCP commitment IX.5.b3)
Air Const. Permit			2001/06/28	CCO submitted additional information or air review.
Air Const. Permit			2001/07/06	DNR response letter "Based on the information submitted, the incinerator will be exempt from requiring a new source permit prior to construction under s. NR 405.04 Wisc. Adm. Code."
Air Operating Permit	---	2001/11/01		If the project is exempt from an Air Construction Permit, CCP shall update the Title V application that was submitted for the facility in 1994.(reference IX.5.b2)
Air Operating Permit	2001/10/01	2002/01/15 (target)		DNR and CCP will establish timeline for review of CCP's original and revised air operating permit application
Air -MACT		2000/07/31	<i>Done</i>	Facility holds at least one information meeting with the public to discuss anticipated activities described in the draft NIC for achieving compliance with the emission standards of this subpart... (CCP held information meeting even though a United States Court of Appeals, District of Columbia, July 25, 2000 decision vacated this specific requirement of 40CFR 63, Subpart EEE-HWC MACT 63.1210(c)(1))
Air-MACT		2000/06/31	<i>Done</i>	Facility makes a draft of the Notice of Intent to Comply (NIC) available for public review no later than 30 days prior to the public meeting (CCP provided notice even though a United States Court of Appeals, District of Columbia, July 25, 2000 decision later vacated this specific requirement of 40CFR 63, Subpart EEE-HWC MACT 63.1210(c)(1))

Air MACT		2001/10/01 ■	2001/10/01*	Facility stops burning hazardous waste in HW Combustor by October 1, 2001 and notifies DNR of change in process operations. (reference CCP commitment .IX.A.1)
CCP	1999/12/01	1999/02/01	<i>Done</i>	CCP Conducted Feasibility Study of MPPE Waste Minimization Project
CCP	---	2000/02/15	<i>Done</i>	CCP Submitted Preliminary Design on MPPE Waste Minimization Project
CCP	2001/04/01	2001/06/01	<i>Done</i>	Shop construction of MPPE
CCP	---	2000/07/01	<i>Done</i>	CCP submits draft NIC and notifies intent to close incinerator to DNR & U.S. EPA
CCP		2000/07/10	<i>Done</i>	CCP submits Concept Design (reference CCP commitment IX.A.4)
CCP		2000/07/31	<i>Done</i>	Meeting to describe draft NIC and Environmental Cooperative Agreement and solicit input and participation in Interested Parties Group
CCP		2000/10/21	<i>Done</i>	CCP submits closure plan modification for HW Facility (reference CCP commitment IX.A.5.a)
CCP	---	2000/10/30	<i>Done</i>	DNR provides identifies requirements and timeline for final decision-making
CCP	2001/08/21	2000/11/21 (target)	2001/02/28 <i>Done</i>	DNR reviews Closure Plan and requests additional information
CCP		2001/03/28 (target)	2001/09/24 <i>Done</i>	CCP provides additional information for TSD closure plan modification, if required.
CCP		2001/03/31	<i>Done</i>	CCP submits Specs to contractors for MPPE Unit
CCP		2001/04/15	<i>Done</i>	CCP receives Bid Package on Waste Minimization Project
CCP		2001/05/1	<i>Done</i>	CCP awards project to contractor
CCP		2001/06/01 (or before)	<i>Done</i>	Primary components of MPPE delivered to CCP
CCP	2001/06/01	2001/07/31	<i>Done</i>	CCP Systems installation (piping and utility connections)

		(target)		
CCP	2001/07/01	2001/08/31 (target)	2001/09/14 <i>Done</i>	CCP System shakedown (training and debugging)
CCP	2001/08/01	2001/08/01	2001/09/28*	CCP Target Completion Date for MPPE installation, stopping burning hazardous waste in incinerator and decontamination and testing of piping and tanks downstream of MPPE.
CCP	2001/09/01	2001/09/31	2001/09/28*	Contingency Completion Date for MPPE installation, stopping burning hazardous waste in incinerator and decontamination and testing of piping and tanks downstream of MPPE.
CCP		2001/11/01 (part)2002/01/05 (total)		Facility submits certification of completion of HW TSD closure and a closure documentation report
CCP		2001/11/15		Pretreatment Baseline Monitoring Report and Plans and Specifications to WDNR for "Zero Discharge Wastewater Treatment System (CCP's Non-hazardous wastewater incinerator)
CCP	2001/04/01	Within 90 days of submittal		DNR Review of Pretreatment Baseline Monitoring Report & Plans and Specifications
CCP		2002/10/01		EPA MACT Deadline for hazardous combustor closure . under <i>40CFR 63, Subpart EEE-HWC MACT 63.1210(c)(1)</i> Note CCP has agreed to stop burning hazardous waste in its incinerator one year before this deadline as part of this Environmental Cooperative Agreement Note: this rule has been in additional litigation and court decisions make affect rule requirements.
CEA-A		1999/04/23	<i>Done</i>	CCP submits letter of intent to apply for Environmental Cooperative Agreement
CEA-A		1999/05/	<i>Done</i>	DNR Response on Environmental Cooperative Agreement
CEA-A		1999/08/22	<i>Done</i>	CCP submits proposed Environmental Cooperative Agreement

CEA-A		1999/09/29	<i>Done</i>	DNR sends CCP proposed Environmental Cooperative Agreement to EPA Region V for initial review and comment
CEA-A		2000/02/09	<i>Done</i>	DNR & CCP conference call on Env. Coop. Agreement
CEA-A		2000/02/17	<i>Done</i>	DNR & CCP meeting with Region V EPA on to Environmental Cooperative Agreement
CEA-A		2000/04/25	<i>Done</i>	EPA initial letter to DNR on issues related to Environmental Cooperative Agreement
CEA-A	2000/04/25	2000/06/05	<i>Done</i>	Prepare Environmental Cooperative Agreement "working draft" of DNR counter-proposal
CEA-A	2000/06/06	2000/06/19	<i>Done</i>	"Working Draft" of DNR counter-proposal sent to DNR staff and participants for review
CEA-A	2000/07/14	2000/07/21	<i>Done</i>	DNR Internal review of "final draft" Environmental Cooperative Agreement DNR counter-proposal prior to public notice
CEA-A		2000/07/31	<i>Done</i>	CCP holds public meeting on MACT NIC and initial meeting for Interested Persons Group. (Ref CCP commitment IX.A.1)
CEA-A		2000/07/24	<i>Done</i>	Public Notice of Intent to Negotiate & availability of DNR Environmental Cooperative Agreement DNR counter-proposal
CEA-A	2000/08/01	2001/02/15	<i>Done</i>	Environmental Cooperative Agreement negotiation period (target)
CEA-A	2001/08/08	2001/02/19	<i>Done</i>	DNR Prepare final Env. Coop Agreement
CEA-A	2001/02/19	2001/02/26 Target	<i>Done</i>	Public Notice Final Environmental Cooperative Agreement and public informational meeting (target)
CEA-A	2001/03/20 (week of)	2001/03/22 (week of)	2001/03/22 <i>Done</i>	CCP and DNR hold public informational meeting on Environmental Cooperative Agreement to solicit comments and input
CEA-A	2001/03/22	2001/03/30	2001/04/09 <i>Done</i>	End of 30-day Public Comment Period on Environmental Cooperative Agreement

CEA-A	2001/04/02	2001/04/06	2001/09/21 <i>Done</i>	DNR reviews public comments on Agreement and prepares summary and DNR response and notifies CCP and Public
CEA-A	2001/04/09	2001/09/15 Target	2002/10/01*	DNR formally acts on Environmental Cooperative Agreement.
CEA-A		2001/12/01		CCP shares with DNR and CAC initial report results of feasibility studies for waste minimization including preliminary feasibility determination and timeline for implementation including: 1) Solvent reduction and reclamation and 2) Waste glycol.
	2001/12/01	2002/01/31		CCP discusses results of waste minimization feasibility studies with DNR and CAC.
CEA-A		2002/02/01		CCP submits final report of feasibility study for waste minimization of including preliminary feasibility determination and timeline for implementation including: 1) Solvent reduction and reclamation and 2) Waste glycol
CEA-A	2001/10/01	2002/04/01		CCP completes initial baseline performance report for Cooperative Agreement (reference CCP commitment XII.A) and shares with DNR and Community Advisory Committee (Interested Persons Group)
CEA-A		2002/04/01		CCP completes case study on MPPE project (reference CCP commitment XII.B)
CEA-A	2000/04/01	2002/10/01		CCP Completes first annual performance report and shares with DNR and Interested Persons Group
CEA-A	2001	2006	Quarterly or as agreed upon by CCP's CAC	CCP meets with interested parties group to discuss progress on waste minimization projects, the Agreement and EMS.
TSD-c		2000/07/01	<i>Done</i>	Facility notifies DNR of intent to close HW TSD Permitted Facility CCP (reference CCP commitment IX.A.1)
TSD-c		2000/10/01	2000/10/21	Facility submits draft Hazardous Waste TSD Closure Plan modification

		(target)	<i>Done</i>	including identification of any existing equipment that may be used in the new process and a timeline and procedure for transition of functions (reference CCP commitment IX.A.4)
TSD-c	2000/08/01	2001/02/26	2001/02/28 <i>Done</i>	WDNR completes initial review of draft Hazardous Waste TSD Closure Plan modification and formally notifies CCP of the results of initial review of CCP's draft TSD closure plan modification for completeness and determines modification is a class 1 plan modification.
TSD-c		2000/04/15	2001/07/28 <i>Done</i>	Facility receives final volume of waste from off-site CCP facility
TSD-c		2001/03/15 (target)	2001/09/24 <i>Done</i>	CCP provides additional information for TSD closure plan modification, if required.
TSD-c		2001/04/15 (target) 30 days after receipt of complete closure plan	2001/09/28*	Once WDNR has received a complete TSD closure plan modification, DNR finishes review within [30] days and notifies CCP of DNR determination.
TSD-c		2001/09/01	2001/09/14 <i>Done</i>	Start-up and Performance Testing of MPPE System (unofficial termination of hazardous waste incineration)
TSD-c		2001/09/28	2001/09/28*	Conduct tests to ensure that the MPPE System is working as projected: 1. Documentation of that the remaining reaction water is not a characteristic hazardous waste based on standard tests for Hazardous Waste Ignitability and Corrosivity 2. Documentation that the MPPE unit provides 99.9% removal of xylene constituents using a level of detection similar to that used in the Chatam Virginia plot study.
TSD-c		2001/09/28	2001/09/28*	Decontamination of piping and tanks downstream of MPPE System. Complete and verified by standard tests for hazardous waste as provided in

				the closure plan.
TSD-c		2001/10/01	2001/10/01*	Official date that CCP stops burning hazardous wastes in its incinerator. CCP commits to no longer burning hazardous waste in its incinerator and operating the MPPE System and all units upstream of the MPPE System as a totally enclosed treatment unit by signing the Environmental Cooperative Agreement with WDNR.
TSD-c		2001/10/05		Receipt of analytical results of downstream rinseate - Verification of clean closure of downstream tanks.
TSD-c		2001/11/01		CCP certifies clean closure of all tanks and piping downstream of the MPPE System, clean closure of the incinerator, and verifies that the MPPE System is working as projected and the the incinerator is not burning hazardous waste based on available monitoring data.* Certification to be completed by CCP and a professional engineer for review by WDNR on an expedited basis.
TSD-c		2001/11/15 (target)		WDNR reviews and acts on first phase of CCP closure and notifies CCP of determination.
TSD-c		2001/12/01		CCP completes decontamination for all tanks and piping upstream of MPPE System. (CCP will follow all Large Quantity Generator regulatory requirements as it uses these tanks in the future.)
TSD-c		2002/01/01		CCP sunmits certification that closure of all tanks and piping upstream of the MPPE System is complete and that closure of all previously licensed hazardous waste units are complete to WDNR.* Certification to be completed by CCP and a professional engineer.
TSD-c		2001/02/01 or 30 days after receipt of complete certification		WDNR acts on CCP TSD completion of HW closure and notifies CCP of determination.

WW		2000/07/17 ■	<i>Plan Submitted</i>	CCP submits Concept Design Plan indicating whether CCP will have a "Zero discharge wastewater treatment system" (CCP's Non-hazardous Wastewater Incinerator) or discharge wastewater to the Saukville wastewater Treatment Plant (reference CCP commitment IX.A.4)
WW	2000/07/01	2001/11/15		Facility submits pretreatment baseline monitoring report (NR 211.15 Wis. Adm Code). (reference CCP commitment IX.A.5c) for "Zero Discharge Wastewater Treatment System" (CCP's Non-hazardous wastewater incinerator).
WW		2001/11/15		Facility submits pretreatment Plans and Specifications for approval under chapter 281.41, Wis. Statutes. (reference CCP commitment IX.5.c) for "Zero Discharge Wastewater Treatment System" (CCP's Non-hazardous wastewater incinerator).*
WW		2001/12/15 (target)		DNR completes preliminary review of Pretreatment Control document after receipt of BMR and pretreatment facility plan for for "Zero Discharge Wastewater Treatment System" (CCP's Non-hazardous wastewater incinerator) and notifies CCP of any additional information that is required prior to final decision. *
WW		2002/01/15 (target) within 30 day of notification		CCP Submits any additional information required for Pretreatment Plans and Specification Review
WW		2002/02/15 (target) within 90 days of receipt of completed application		DNR makes final decision on Pretreatment Control document and notifies CCP of approval, denial, or any additional information that is required prior to final decision for "Zero Discharge Wastewater Treatment System" (CCP's Non-hazardous wastewater incinerator)*. *Note: that this approval is not legally required for operation of the system, but both DNR and CCP agree that is it desirable to have the MPPE unit reviewed to determine if it meets Pretreatment Requirements for an Organic Chemicals and to establish a monitoring record for the unit. The approval of the will be for a for "Zero Discharge Wastewater Treatment System" (CCP's Non-

				hazardous wastewater incinerator). This approval will not permit discharge to the Saukville wastewater treatment plant.
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* Actions marked with a * refer to actions currently being worked on (as of Sept. 26, 2001) that are anticipated to be completed by the dates indicated.